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Honorable Paul A. Crotty Andrew H. Bart Tel 212 891-1645 United States District Judge Fax 212 891-1699 United States District Court

Southern District of New York 500 Pearl Street, Room 735

New York, New York 10007

Re: Ana Beatriz Lontra Jobim, et al. v. Songs of Universal, Case No. 05cv3527; V.M. Producoes, et al. v. Songs of Universal, Case No. 06cv6407

Dear Judge Crotty:

January 6, 2009

VIA FACSIMILE

I am writing on behalf of all parties in the two above-referenced matters to request a brief extension of the current deadline to complete all fact discovery. The parties have encountered difficulties in concluding the depositions of the two remaining third-party witnesses due to the holidays and various scheduling conflicts. All parties expect that these last two depositions will be concluded during the month of January & Given these facts, all parties request an extension of the current discovery deadline from December 31, 2008 to January 30, 2009.

Respectfully submitted,

Andrew H. Bart

AHB:ab

John Rosenberg, Esq. (via facsimile) cc: Arthur Lehman, Esq. (via facsimile)

Matthew Giger, Esq. (via facsimile)

SO ORDERED: 117/09

UNITED STATES DISTRICT JUDGE